

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

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SHAWNNA THIBODEAU	:	Civil Action No. 08 CV 01662(JFB)
	:	
Plaintiff	:	NOTICE OF MOTION TO DISMISS
vs.	:	DEFENDANTS, PINNACLE FX
	:	INVESTMENTS, DEXTER BELL AND
PINNACLE FX INVESTMENTS,	:	ROLAND FRANCIS
RAZOR FX, INC., DEXTER	:	
BELL, ROLAND FRANCIS and	:	
MICHAEL RICHARD McCAULL	:	
	:	
Defendants.	:	
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New York, New York 10019

PLEASE TAKE NOTICE that upon the annexed Declaration of Dexter Bell, dated June 23, 2008, and the exhibit thereto, and the accompanying memorandum of law in support of this motion, Defendants, Pinnacle FX Investments, Dexter Bell and Roland Francis will move this Court before the Honorable Joseph F. Bianco at the United States Courthouse for the Eastern District of New York, on a date and at a time to be determined by this Court, for an order dismissing this action pursuant to Fed. R. Civ. P. 12(b)(2)-(5), and 28 U.S.C. § 1406(a), or in the alternative, transferring venue pursuant to 28 U.S.C. § 1404(a) to the Western District of Washington State, and for such other and further relief as the Court deems proper and just.

PLEASE TAKE FURTHER NOTICE that in accordance with the briefing schedule set by this Court, Plaintiff's opposition papers are to be served by July 30, 2008 and the moving Defendants' reply papers are to be served by August 11, 2008.

Dated: New York, New York  
June 26, 2008

/s/ Jan Meyer  
Jan Meyer (JM3063)  
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